LINDANE DUMP SITE UNILATERAL ADMINISTRATIVE ORDER FOR ACCESS * INDEX OF DOCUMENTS

I. DECISION DOCUMENTS

- 1. Record of Deed for Allegheny Ludlum property, 4/9/62. P. 000001-000002.
- Record of Decision, Lindane Dump Site, 3/31/92.
 P. 000003-000081.
- 3. Lindane Dump Superfund Site Remedial Design/Remedial Action Consent Decree In The Matter Of: United States of America vs. Elf Atochem North America, Inc., (Elf Atochem), Civil Action No. 93-2182, 5/3/93. P. 000082-000174.
- 4. Report: <u>Pilot-Scale Leachate/Shallow Groundwater</u>

 <u>Treatability Study Report for the Lindane Dump Site</u>,
 prepared by Eckenfelder Inc., 5/94. P. 000175-000291.
- 5. Report: Remedial Design Work Plan for Lindane Dump Site, prepared by Eckenfelder Inc., 7/94. P. 000292-000333.
- 6. Letter to Mr. John M. Tishok, Allegheny Ludlum Corporation (Allegheny Ludlum), from Ms. Marina Liacouras Bouley, Elf Atochem, re: Transmittal of draft license for right of entry to Allegheny Ludlum Property, 12/8/94. P. 000334-000338. A December 1994 draft license agreement, a site map, and a December 1, 1994, memorandum are attached.
- 7. Letter to Mr. John M. Tishok, Allegheny Ludlum, from Ms. Karen H. Davis, Elf Atochem, re: Request for access to Allegheny Ludlum property, 3/8/95.
 P. 000339-000344. A draft license agreement and an excerpt of the Consent Decree regarding access are attached.
- * Administrative Record File available 6/17/96, updated 4/8/97.

This Index of Documents for the Unilateral Administrative Order for Access, EPA Docket No. III-96-71-DC, hereby incorporates by reference the documents contained in the Administrative Record in support of the EPA Record of Decision for the Lindane Dump Site issued March 31, 1992.

- 8. Letter to Ms. Karen H. Davis, Elf Atochem, from Mr. John M. Tishok, Allegheny Ludlum, re: Response to Elf Atochem's March 8, 1995, request for access to Allegheny Ludlum Property, 4/6/95. P. 000345-000345.
- 9. Letter to Mr. Doug Loutzenhiser, Elf Atochem North America, Inc., from Mr. Michael T. Bazydola and Jeffrey L. Pintenich, Eckenfelder Inc., re: Land requirements for upgraded leachate/shallow ground water treatment system, 5/17/95. P. 000346-000346.
- 10. Letter to Ms. Donna Santiago, U.S. EPA, from Mr. Doug Loutzenhiser, Elf Atochem, re: Elf Atochem's inability to gain access to a portion of Allegheny Ludlum's property, 5/23/95. P. 000347-000349.
- 11. Report: Preliminary Remedial Design for Lindane Dump Site, Volume I, Engineering Report, prepared by Eckenfelder Inc., 7/95. P. 000350-000544.
- 12. Report: Preliminary Remedial Design for Lindane Dump Site, Volume III, Geotechnical Investigation and Slope Stability Analysis Report, prepared by Eckenfelder Inc., 7/95. P. 000545-000683.
- 13. Report: Preliminary Remedial Design for Lindane Dump Site, Volume IV, Attachments C, D, E, and F, prepared by Eckenfelder Inc., 7/95. P. 000684-0009160. Preliminary construction plans are attached.
- 14. Letter to Ms. Patricia Miller, U.S. EPA, from Ms. Karen H. Davis, Elf Atochem, re: Elf Atochem's need for access to a portion of Allegheny Ludlum's land for the purpose of sample collection, 11/28/95. P. 000917-000917.
- 15. Letter to Mr. Doug Loutzenhiser, Elf Atochem, from Ms. Donna Santiago, U.S. EPA, re: Transmittal of U.S. EPA's 30% Remedial Design Review, 1/24/96. P. 000918-000938. The review and a December 7, 1995 letter are attached.
- 16. Report: Response to U.S. EPA Comments on the Preliminary Remedial Design for Lindane Dump Site, prepared by Eckenfelder Inc., 3/96. P. 000939-001251.
- 17. Letter to Ms. Donna Santiago, U.S. EPA, from Mr. Doug Loutzenhiser, Elf Atochem, re: Response to EPA and

- Pennsylvania Department of Environmental Protection (PADEP) comments on the preliminary design action, 3/29/96. P. 001252-001254.
- 18. Letter to Ms. Karen Davis, Elf Atochem, from Ms. Patricia C. Miller, U.S. EPA, re: Notice of EPA designation of Elf Atochem as its representative solely for purposes of access to the parcel owned by Allegheny Ludlum, 5/7/96. P. 001255-001255.
- 19. Letter to Mr. John M. Tishok, Allegheny Ludlum, from Ms. Patricia C. Miller, U.S. EPA, re: Request that Allegheny Ludlum Corporation grant Elf Atochem immediate access to Lindane Dump Site, 5/7/96. P. 001256-001257.
- 20. Letter to Ms. Patricia C. Miller, U.S. EPA, from Mr. John M. Tishok, Allegheny Ludlum, re: Transmittal of license agreement providing Elf Atochem access to a parcel of Allegheny Ludlum's property, 5/9/96.
 P. 001258-001264. A copy of the license agreement is attached.
- 21. Letter to Ms. Patricia C. Miller, U.S. EPA, from Mr. John M. Tishok, Allegheny Ludlum, re: Notification of rejection of Allegheny Ludlum's proposed license agreement by Elf Atochem, 5/17/96. P. 001265-001266.
- 22. Unilateral Administrative Order for Access In The Matter Of: Lindane Dump Superfund Site, Allegheny, Pennsylvania, Docket No. III-96-71-DC, 5/23/96. P. 001267-001311.
- 23. Establishment of Administrative Record In The Matter Of: Lindane Dump Superfund Site, Docket No. III-96-71-DC, 5/23/96. P. 001312-001315. A draft Administrative Record index is attached.

II. MONTHLY PROGRESS REPORTS

- 1. Report: <u>December 1994 Monthly Progress Report</u>, prepared by Elf Atochem, 1/13/95. P. 001316-001319.
- 2. Report: <u>January 1995 Monthly Progress Report</u>, prepared by Elf Atochem, 2/15/95. P. 001320-001323.

- 3. Report: February 1995 Monthly Progress Report, prepared by Elf Atochem, 3/15/95. P. 001324-001328. A February 17, 1995, laboratory analysis report of raw water intake on the Allegheny River is attached.
- 4. Report: March 1995 Monthly Progress Report, prepared by Elf Atochem, 4/17/95. P. 001328-001330.
- 5. Report: April 1995 Monthly Progress Report, prepared by Elf Atochem, 5/15/95. P. 001331-001333.
- 6. Report: May 1995 Monthly Progress Report, prepared by Elf Atochem, 6/9/95. P. 001334-001336.
- 7. Report: <u>June 1995 Monthly Progress Report</u>, prepared by Elf Atochem, 7/14/95. P. 001337-001342. A June 19, 1995, laboratory analysis report for a raw water tap sample is attached.
- 8. Report: <u>July 1995 Monthly Progress Report</u>, prepared by Elf Atochem, 8/15/95. P. 001343-001345.
- 9. Report: August 1995 Monthly Progress Report, prepared by Elf Atochem, 9/14/95. P. 001346-001348.
- 10. Report: <u>September 1995 Monthly Progress Report</u>, prepared by Elf Atochem, 10/13/95. P. 001349-001458. A September 26, 1995, laboratory analysis of report of raw water intake on the Allegheny River is attached.
- 11. Report: October 1995 Monthly Progress Report, prepared by Elf Atochem, 11/10/95. P. 001359-001361.
- 12. Report: November 1995 Monthly Progress Report, prepared by Elf Atochem, 12/15/95. P. 001362-001365. A December 7, 1995, letter requesting that Allegheny Ludlum reacquire the ALSCO Park property is attached.
- 13. Report: <u>December 1995 Monthly Progress Report</u>, prepared by Elf Atochem, 1/15/96. P. 001366-001368.
- 14. Report: <u>January 1996 Monthly Progress Report</u>, prepared by Elf Atochem, 2/15/96. P. 001369-001371.
- 16. Report: February 1996 Monthly Progress Report, prepared by Elf Atochem, 3/14/96. P. 001372-001380. A February 23, 1996, laboratory analysis report of raw water intake on the Allegheny River is attached.

- 17. Report: <u>March 1996 Monthly Progress Report</u>, prepared by Elf Atochem, 4/12/96. P. 001381-001383.
- 18. Report: April 1996 Monthly Progress Report, prepared by Elf Atochem, 5/15/96. P. 001384-001386.

III. POTENTIALLY RESPONSIBLE PARTY (PRP) DETERMINATIONS

- 1. Letter to Mr. John Tishok, Allegheny Ludlum, from Mr. Abraham Ferdas, U.S. EPA, re: Special Notice for negotiation of costs relating to remedial design and remedial action (RD/RA) at the site, 6/15/92. P. 001387-001392.
- 2. Letter to Ms. Karen Heaphee, Elf Atochem, from Mr. Abraham Ferdas, U.S. EPA, re: Special Notice for negotiation of costs relating to RD/RA at the site, 6/15/92. P. 001393-001398.
- 3. Letter to Mr. Craig A. Neeley, Harrison Township Board of Commissioners, from Mr. Abraham Ferdas, U.S. EPA, re: Special Notice for negotiation of costs relating to RD/RA at the site, 6/15/92. P. 001399-001404.
- 4. Letter to Mr. Martin Kotsch, U.S. EPA, from Mr. John M. Tishok, Allegheny Ludlum, re: Response to EPA Special Notice letter dated June 15, 1992, 8/17/92. P. 001405-001406.
- 5. Letter to Mr. Martin Kotsch, U.S. EPA, from Mr. Douglas L. Cox, Elf Atochem, re: Good Faith Offer in response to EPA special notice letter dated June 15, 1992, 8/17/92. P. 001407-001412. An August 17, 1992, transmittal letter to Ms. Patricia C. Miller, U.S. EPA, from Mr. William J. Kennedy, Dechert Price & Rhoads is attached.
- 6. Letter to Mr. Martin T. Kotsch, U.S. EPA, from Mr. Arthur I. Leaderman, Smith, Pachter, McWhorter & D'Ambrosio, and Mr. James L. Nardelli, Nardelli & Nardelli, re: Harrison Township's response to EPA Special Notice Letter dated June 15, 1992, 8/17/92. P. 001413-001415.
- 7. Letter to Mr. Douglas L. Cox, Elf Atochem, from Mr. Abraham Ferdas, U.S. EPA, re: Notification that EPA does not consider the offer set forth in Elf Atochem's letter of August 17, 1992, to be a good faith offer, and that EPA will consider entering into negotiations

for an RD/RA Consent Decree and settlement of past response costs only if EPA receives confirmation, within five business days, of Elf Atochem's willingness to reimburse the U.S. for past costs, 8/20/92. P. 001416-001417.

- 8. Letter to Mr. Arthur I. Leaderman, Smith, Pachter, McWhorter & D'Ambrosio, to Mr. Abraham Ferdas, U.S. EPA, re: Notification that EPA does not consider the offer set forth in Harrison Township's letter of August 17, 1992, to be a good faith offer, and that the EPA took Harrison Township's willingness to support a prompt and expeditious remedy at the site as a sincere offer to participate in the cleanup, 8/20/92. P. 001418-001419.
- 9. Letter to Mr. John M. Tishok, Allegheny Ludlum, from Mr. Abraham Ferdas, U.S. EPA, re: Notification that EPA does not consider the offer set forth in Allegheny Ludlum's letter of August 17, 1992, to be a good faith offer, 8/22/92. P. 001420-001421.
- 10. Letter to Mr. Abraham Ferdas, U.S. EPA, from Ms. Karen H. Davis, Elf Atochem, re: Confirmation that Elf Atochem is willing to reimburse the U.S. for past costs and all future costs as defined in the proposed Consent Decree, and that Elf Atochem is prepared to move forward with negotiations as indicated in EPA's letter of August 20, 1992, 8/27/92 P. 001422-001423.
- 11. Letter to Mr. Douglas L. Cox, Elf Atochem, from Ms. Patricia C. Miller, U.S. EPA, re: Notification that EPA is prepared to enter into RD/RA Consent Decree negotiations with Elf Atochem, 8/31/92. P. 001424-001424.
- 12. List of PRPs, Lindane Dump Site, (undated). P. 001425-001425.